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**From:** Hah, Josephine [Hah.Josephine@epa.gov]  
**Sent:** 8/12/2019 9:29:13 PM  
**To:** McGhee-Lenart, Renee [McGhee-Lenart.Renee@epa.gov]  
**CC:** Verhalen, Frances [verhalen.frances@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]; Garcia, David [Garcia.David@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Taheri, Diane [Taheri.Diane@epa.gov]; Bokun, Lisa [Bokun.Lisa@epa.gov]  
**Subject:** FW: EPA OIG Air Toxics RTR/Congressional Request Audit -- Request for Information by August 12th  
**Attachments:** 2014 NATA Ethylene Oxide mtg with TCEQ and LDEQ-Agenda 042319.docx; ETO Region 6 Comms Plan 3.18.19 DRAFT.docx; Ethylene Oxide HoustonAirAlliance fact sheet 032019.docx

Renee,

Please see Region 6's response in blue below and attached documents.

As you are aware, EPA-OIG is currently conducting an audit of the agency's air toxics Risk and Technology Review (RTR) process and that we have expanded our scope to address recent Congressional requests related to ethylene oxide emissions and risk communication. We understand that the following facilities in Region 6 contribute to elevated cancer risks based on modeling conducted by the Office of Air Quality Planning and Standards (OAQPS) to develop the 2014 NATA:

- BCP Ingredients Inc. (St. Gabriel, LA)
- Union Carbide Corp. – St. Charles Operations (Taft, LA)
- Huntsman Port Neches Plant (Port Neches, TX)
- Eastman Chemical Texas Operations (Longview, TX)
- Taminco US Inc. (St. Gabriel, LA)
- Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex (Westlake, LA)
- Air Products Performance Manufacturing Inc. – Reserve Plant (Evonik Materials Corp. (Reserve, LA)
- Shell Technology Center Houston (Houston, TX)
- Midwest Sterilization Corp. (Laredo, TX)
- Sterigenics (Santa Teresa, NM)

As part of our audit, please provide the following by COB August 12, 2019:

- Any communications plan drafted or finalized as of August 2, 2019 to communicate to the public in Region 6 about elevated cancer risks they may be experiencing from ethylene oxide emissions, and EPA prepared the DRAFT EtO Comms Plan (attached) as of March, 2019. This is the last update prior to any further discussion regarding the top facilities. After a meeting with the States of Louisiana and Texas in April 2019, EPA agreed that the States would have the lead on communications and EPA would provide them with requested support.  
[NOTE: this document has not been released outside EPA.]
- A response to the following questions:
  - Since the release of the 2014 NATA to the public on August 22, 2018, what outreach (e.g., public meetings, webinars, etc.) has Region 6 conducted to inform residents about the elevated cancer risks they may be experiencing as a result of ethylene oxide emissions from the above ten facilities? If so, please provide the:
    - type of outreach (e.g., public meetings, webinars, etc.) conducted for these residents,
    - date of each outreach,
    - location of each outreach if applicable, and
    - outreach documentation (e.g., sign-in sheets, meeting agenda, briefing materials, etc.).

- Since the release of the 2014 NATA to the public on August 22, 2018, what outreach (e.g., face-to-face meeting, conference call, etc.) has Region 6 conducted to inform elected officials about the elevated cancer risk their constituents may be experiencing as a result of ethylene oxide emissions from the above ten facilities? If so, please provide the:
  - type of outreach (e.g., face-to-face meeting, conference call, etc.) conducted for these elected officials,
  - date of each outreach,
  - location of each outreach if applicable, and
  - outreach documentation (e.g., sign-in sheets, meeting agenda, briefing materials, etc.).

EPA R6 has conducted minimal outreach to the communities surrounding the 10 listed facilities. EPA R6 discussed the status of emissions control with the State of New Mexico for the Santa Teresa facility in 2017 and determined that the activities completed by Sterigenics reduced the emissions to the extent that the estimated risk from that facility was below the  $10^{-4}$  risk level. EPA R6 also discussed projected activities about the remaining 9 facilities with the States of Louisiana and Texas in a meeting on April 24, 2019 (agenda Attached). Louisiana and Texas requested that they be the lead on communication with the citizens and industries within their states.

1. Direct response: On October 24, 2018, EPA R6 responded to written formal communication from the Air Alliance Houston and then followed up with a teleconference on March 21, 2019. The attached fact sheet was used during the teleconference. [NOTE: this document has not been released outside EPA.]
2. Indirect Response: On February 19, 2019, EPA R6 attended and participated in a community meeting in LaPlace, LA. This meeting was to discuss the actions to date by the Denka facility for chloroprene. Additional questions were asked of EPA R6 about risks associated with ethylene oxide coming from two facilities (Union Carbide in Taft and Evoniks in Reserve) that will impact the LaPlace community. EPA responded to the questions.

If there are additional facilities contributing to elevated cancer risks that Region 6 has independently modeled or modeled with assistance from OAQPS, please also provide the name and location of the facilities and information on any outreach (i.e., type of outreach, date of each outreach, location of outreach if applicable, and outreach documentation) conducted by Region 6 for residents and elected officials by COB August 12, 2019.

If you require anything further, please let us know. Thank you.

**Josephine Hah, CPA** | Accountant | Finance Operations Section | Mississou Support Division | U.S. Environmental Protection Agency, Region 6 | ☎: 214-665-9780 | ✉: [Hah.Josephine@epa.gov](mailto:Hah.Josephine@epa.gov)

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**From:** McGhee-Lenart, Renee <[McGhee-Lenart.Renee@epa.gov](mailto:McGhee-Lenart.Renee@epa.gov)>

**Sent:** Sunday, August 4, 2019 4:55 PM

**To:** Stenger, Wren <[stenger.wren@epa.gov](mailto:stenger.wren@epa.gov)>; Garcia, David <[Garcia.David@epa.gov](mailto:Garcia.David@epa.gov)>

**Cc:** Seager, Cheryl <[Seager.Cheryl@epa.gov](mailto:Seager.Cheryl@epa.gov)>; Taheri, Diane <[Taheri.Diane@epa.gov](mailto:Taheri.Diane@epa.gov)>; Hah, Josephine <[Hah.Josephine@epa.gov](mailto:Hah.Josephine@epa.gov)>

**Subject:** EPA OIG Air Toxics RTR/Congressional Request Audit -- Request for Information by August 12th

Wren and David,

As you are aware, EPA-OIG is currently conducting an audit of the agency's air toxics Risk and Technology Review (RTR) process and that we have expanded our scope to address recent Congressional requests related to ethylene oxide emissions and risk communication. We understand that the following facilities in Region 6 contribute to elevated cancer risks based on modeling conducted by the Office of Air Quality Planning and Standards (OAQPS) to develop the 2014 NATA:

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As part of our audit, please provide the following by COB August 12, 2019:

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- A response to the following questions:
  - Since the release of the 2014 NATA to the public on August 22, 2018, what outreach (e.g., public meetings, webinars, etc.) has Region 6 conducted to inform residents about the elevated cancer risks they may be experiencing as a result of ethylene oxide emissions from the above ten facilities? If so, please provide the:
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If there are additional facilities contributing to elevated cancer risks that Region 6 has independently modeled or modeled with assistance from OAQPS, please also provide the name and location of the facilities and information on any outreach (i.e., type of outreach, date of each outreach, location of outreach if applicable, and outreach documentation) conducted by Region 6 for residents and elected officials by COB August 12, 2019.

Thank you for your assistance. Please let me know if you have any questions.

Renee McGhee-Lenart

*Renee McGhee-Lenart  
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